

**VIA ECF**

The Honorable Arun Subramanian  
United States District Court, Southern District of New York  
500 Pearl St., Courtroom 15A  
New York, NY 10007-1312

**Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC**

Dear Judge Subramanian,

Defendants write, pursuant to Rules 11(C)(ii)-(iii) of Your Honor's Individual Practices, to respectfully request leave to file a redacted version of its Letter Motion to Compel and a sealed version of one of the three accompanying exhibits. Per Your Honor's Individual Practices and the Amended Protective Order, (Dkt No. 347 ¶ 9), Defendants, simultaneous to this Letter, file on ECF: (1) a public version of their Letter Motion to Compel with proposed redactions; (2) under seal their unredacted Letter Motion to Compel; and (3) under seal one of the three accompanying exhibits, Exhibit C, to the Letter Motion.<sup>1</sup>

The Amended Protective Order requires:

All Highly Confidential or Confidential Discovery Material or Investigation Material filed with the Court, and all portions of pleadings, motions, or other papers filed with the Court that disclose such Highly Confidential or Confidential Discovery Material or Investigation Material, shall be filed under seal and kept under seal until further order of the Court.

(Dkt No. 347 ¶ 9). Here, the Letter Motion references deposition testimony and documents that either third-party Mr. Abbamondi or SeatGeek has designated as highly confidential or confidential. In addition, Exhibit C is a document produced by Mr. Abbamondi that he designated confidential. On June 23, 2025, Defendants requested Mr. Abbamondi to confirm whether he maintains his confidentiality designation over Exhibit C. Mr. Abbamondi confirmed that he will not maintain his confidentiality designation over Exhibit C. However, because Mr. D'Souza, SeatGeek's co-founder and president, appears on the document, SeatGeek represented to Defendants that it will seek to seal Exhibit C. Accordingly, Defendants request that the Court grant leave to provisionally redact the Letter Motion to Compel and to file Exhibit C under seal.

Additionally, pursuant to Your Honor's Individual Practices, Defendants have notified Mr. Abbamondi and SeatGeek that they each have three business days to file a letter with the Court, explaining the need to maintain the sealing or redactions on the filed documents. (*See* Judge Subramanian Individual Practices in Civil Cases ¶ 11(C)(i)); *see also* *Wenger S.A. v. Olivet Int'l Inc.*, No. 20-CV-1107 (AS), 2024 WL 3581796, at \*1 (S.D.N.Y. June 25, 2024) ("The burden of demonstrating that a document submitted to a court should be sealed rests on the party seeking such action." (internal citation omitted)).

*[signatures on following page]*

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<sup>1</sup> The other two of the three accompanying exhibits, Exhibits A-B, do not have confidentiality designations and as such, have been filed publicly without any redactions.

Dated: June 25, 2025

Respectfully submitted,

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cc: All Counsel of Record (via ECF)